

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
JACKSON DIVISION**

OLIVIA Y., by and through her next friend, James D. Johnson;  
JAMISON J., by and through his next friend, Clara Lewis; AND  
DESIREE, RENEE, TYSON, AND MONIQUE P.,  
by and through their next friend, Sylvia Forster; on their  
own behalf and on behalf of all others similarly situated

PLAINTIFFS

V.

CIVIL ACTION NO. 3:04CV251LN

HALEY BARBOUR, as Governor of the State of Mississippi;  
DONALD TAYLOR, as Executive Director of the Department  
of Human Services; AND BILLY MANGOLD,  
as Director of the Division of Family and Children's Services

DEFENDANTS

**PLAINTIFF'S MOTION FOR ADMISSION PRO HAC VICE  
OF MARGARET ROSS**

COME NOW Plaintiffs, pursuant to Rule 83.1(A)(2) of the Uniform Local Rules of the  
United States District Courts for the Northern and Southern Districts of Mississippi, respectfully  
requesting the Court for an Order admitting Margaret Ross *pro hac vice* as additional counsel for  
Plaintiffs, and would show the Court the following:

1. Margaret Ross is a non-resident who is not a member of the Mississippi Bar and is  
not authorized to practice before the Mississippi Supreme Court.

2. Ms. Ross is with Children's Rights, Inc., located at 404 Park Avenue South  
New York, NY, 10016. Her telephone number is (212) 683-2210. Her facsimile number is (212)  
683-4015.

3. Ms. Ross was admitted to practice law in New York in 2003, and is a member of the  
United States District Court for the Eastern District of New York. Ms. Ross is a member in good  
standing of the New York Bar. A copy of Ms. Ross's certificate of good standing for the U.S.  
District Court for the Eastern District of New York is attached as Exhibit A.

4. Ms. Ross is familiar with the Uniform Local Rules of the United States District Courts for the Northern and Southern Districts of Mississippi. *See Affidavit of Margaret Ross*, attached as Exhibit B.

5. Ms. Ross will be associated with Melody McAnally and W. Wayne Drinkwater, Jr. of Bradley Arant Rose & White LLP, both members in good standing with the Mississippi Bar. Their office address is Suite 450, One Jackson Place, 188 East Capitol Street, Post Office Box 1789, Jackson, Mississippi, 39215. Their telephone number is (601) 948-8000. Their facsimile number is (601) 948-3000.

WHEREFORE, Plaintiffs requests that the Court issue an Order admitting Margaret Ross, *pro hac vice*, and for such other relief as may be justified.

Respectfully submitted, this the 10th day of October, 2005.

/s Melody McAnally  
 W. Wayne Drinkwater, Jr. (MBN 6193)  
 Melody McAnally (MBN 101236)  
 BRADLEY ARANT ROSE & WHITE LLP  
 188 East Capitol Street, Suite 450  
 Jackson, MS 39201  
 Telephone: (601) 948-8000  
 Facsimile: (601) 948-3000

Stephen H. Leech (MBN 1173)  
 850 East River Place, Suite 300  
 Jackson, MS 39202  
 Telephone: (601) 355-4013

Marcia Robinson Lowry (MBN 43991 *pro hac vice*)  
 Eric E. Thompson (MBN 43993 *pro hac vice*)  
 Tara S. Crean (MBN 44447 *pro hac vice*)  
 CHILDREN'S RIGHTS  
 404 Park Avenue South, 11th Floor  
 New York, NY 10016  
 Telephone: (212) 683-2210

John Lang (MBN 43987 *pro hac vice*)  
 Christian Carbone (MBN 43986 *pro hac vice*)

Eric Manne (MBN 43988 *pro hac vice*)  
John Piskora (MBN 44474 *pro hac vice*)  
LOEB & LOEB LLP  
345 Park Avenue  
New York, NY 10154  
Telephone: (212) 407-4000

*PLAINTIFFS' COUNSEL*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 10, 2005, I electronically filed the foregoing with the Clerk of the Court using the ECF system, which sent notification of such filing to the following:

Betty A. Mallett, Esq.  
Dewitt L. Fortenberry, Jr, Esq.  
John T. Rouse, Esq.  
McGlinchey Stafford, PLLC  
200 South Lamar Street, Suite 1100  
Jackson, MS 39201

Harold E. Pizzetta, III, Esq.  
Assistant Attorney General  
General Civil Division  
Carroll Gartin Justice Building  
430 High Street  
Jackson, MS 39201

*Attorneys for Defendants*

s/ Melody McAnally